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**LAW DEPARTMENT**  
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March 21, 2023

**VIA E.C.F.**

Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 11201

Application GRANTED. The Clerk of Court is  
directed to terminate ECF No. 46.

SO ORDERED

March 22, 2023

Re: Bahadoran v. City of New York et al.  
21-cv-04884 (JMF)

Your Honor:

I am an Assistant Corporation Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants in the above-referenced action. I write respectfully to request an extension of defendants' time to file their combined summary judgment and Daubert motions from March 31, 2023 to April 28, 2023.<sup>1</sup> I have conferred with plaintiff on this request and he advises that he does not oppose the extension; however, should it be granted, he requests that he be permitted 30 days to serve his opposition to defendants' motions.

The extension is requested by defendants because of the complexities of this case, which concern a police shooting incident resulting in serious injuries to plaintiff (partial paralysis). The parties have conducted extensive fact and expert discovery in this case, including the taking of seven depositions, an exchange of voluminous records, as well as the production of surveillance and police body worn camera videos of the shooting incident. The additional time is needed by defendants to process these documents and present them in a comprehensive format

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<sup>1</sup> The current deadline was set forth in the Court's Order dated December 19, 2022, which provided that motions were due within 30 days of expert discovery end date of March 1, 2023. See ECF Docket No. 42.

in support of their summary judgment motion, as well as their corresponding Daubert motion to preclude the testimony of two police practices experts being proffered by plaintiff.<sup>2</sup>

This is the first request for an extension of the motion deadline by either party. There are no other scheduled dates that will be affected by this extension. Accordingly, it is respectfully requested that the Court grant defendants' application to extend their time to file a their summary judgment and Daubert motions from March 31, 2023 to April 28, 2023; to issue a corresponding extension of plaintiff's time to file opposition to May 30, 2023; and for defendants to serve their reply papers to June 12, 2023.

I thank the Court for its consideration of the foregoing

Respectfully submitted,

*s/ Steve Stavridis*

Steve Stavridis  
Senior Counsel

cc: All counsel of record (by E.C.F.)

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<sup>2</sup> The undersigned's ability to complete the motion within the original deadline was also affected by an overseas trip I had to make earlier this month to attend to a family matter.